

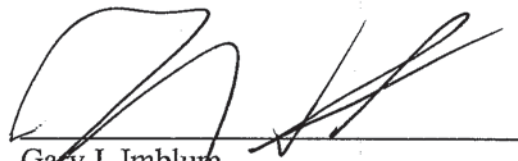
IN RE:	:	
ASHLEY IRENE SMALL,	:	CASE NO. 1-19-02055-HWV
Debtor	:	
	:	CHAPTER 13
FREEDOM MORTGAGE CORPORATION,	:	
Movant	:	
vs.	:	
ASHLEY IRENE SMALL	:	
and	:	
DALE MAGNESS, JR. (Non-Filing Co-Debtor)	:	
NATHANIEL TYLER (Non-Filing Co-Debtor)	:	
Respondents	:	

1. Admitted.
2. Admitted.
3. Admitted in part. Denied in part. Debtor has no knowledge, as to the holder of the mortgage. Strict proof is demanded.
4. Denied. At the time of the filing of the bankruptcy, the property was worth \$189,500.00. That was in 2019. Property values have increased, significantly, since 2019. As stated, by Movant, in paragraph eight (8) of the motion for relief, the payoff of the mortgage is now \$148,782.50. Accordingly, there is a significant equity cushion, providing adequate protection to Movant.
5. Admitted in part and denied in part. Debtor sent one payment to Movant on August 31, 2023. Debtor offers to cure the remainder of the arrears through an amended plan. Debtor is providing adequate protection through regular monthly payments.

6. Admitted in part. Denied in part. See response to paragraph five (5).
7. Admitted.
8. Admitted in part. Denied in part. Debtor has no knowledge as to the payoff of the loan.
9. Denied. See response to paragraph five (5).
10. Denied. All communications should go through Debtor's counsel.
11. Denied. There is no reason why Rule 4001 (a)(3) should not apply.
12. Admitted in part. Denied in part. It is denied that relief is warranted, as set forth in other paragraphs of Debtor's response.
13. Admitted.

WHEREFORE, Debtor respectfully requests that this Honorable Court enter an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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Attorney for Debtors

Dated: _____

9/6/13

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing Debtor's Response to Motion of Freedom Mortgage Corporation for Relief From the Automatic Stay upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

Jack N. Zaharopoulos, Esquire
Chapter 13 Trustee
Via E-Service

Mario Hanyon, Esquire
Counsel For Movant
Via E-Service

IMBLUM LAW OFFICE, P.C.

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Dated: 9/7/2023